

# Murray Legal, PLLC

**MEMO ENDORSED**

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April 13, 2022

**VIA ECF:**

Hon. Valerie Caproni, U.S.D.J.  
United States District Court  
Southern District of New York

RE: *HSCM Bermuda Fund Ltd. v. 24 Capital, LLC, et al.* –  
Docket No.: 21-cv-06904 (VEC)  
Motions to Dismiss – Adjourned Deadline Request

Dear Judge Caproni:

I represent Defendant Business Advance Team LLC d/b/a Everyday Capital (“BAT”) in the above referenced action. I write to request that the Court extend BAT’s time to file a motion to dismiss the Amended Complaint from April 8, 2022, to May 9, 2022. HSCM’s counsel has consented to this request. We previously sent this request to Judge Nathan, but the case was reassigned shortly after the request was filed. We are refileing this request to ensure it is actually presented to the Court.

The reason for the request is that we have reached a settlement in principle with Plaintiff and several related non-parties that will resolve this instant action (insofar as it is against BAT) and most of the primary litigation pending in New York state court and the related action in Florida state court. We have been waiting on a response from HSCM’s counsel for several days to what we believe will be the final draft of the settlement agreement. BAT has been diligent in following up with HSCM’s counsel and pushing conclude this matter.

Thank you kindly for the Court’s attention to this matter. Please feel free to contact the undersigned if the Court has any questions, comments, or concerns.

Sincerely,

/s/ Christopher R. Murray  
Christopher R. Murray, Esq.

Application DENIED. Because the parties have reached a settlement in principle, the Court declines to adjourn Defendant Business Advance Team's deadline to file a motion to dismiss. The Court will issue a 30-day order with respect to this Defendant separately.

The Clerk of Court is respectfully directed to close the open motions at Dockets 74, 118, and 120.

SO ORDERED.

 4/13/22

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE